

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO ETHICON WAVE 12 CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**DEFENDANTS' MOTION TO EXCLUDE
GENERAL OPINIONS OF LENNOX HOYTE, M.D.**

Defendants Ethicon, Inc., Ethicon LLC, and Johnson & Johnson (collectively "Ethicon") hereby move to preclude Dr. Lennox Hoyte from providing general opinions in the cases set forth in Exhibit A hereto. As grounds for this motion, Ethicon submits that, although Dr. Hoyte's case-specific reports include general opinions, Dr. Hoyte has conceded that he intends to limit his opinions to case-specific matters.

In support of this motion, Ethicon incorporates by reference its accompanying memorandum of law and relies on the following exhibits:

1. Listing of cases in Wave 12 in which Dr. Hoyte has been designated to provide opinions, filed herewith as Exhibit A;
2. Dr. Hoyte's report in the *Iretta Lynn Ashbrook* case, Case No. 2:13-cv-10672, filed herewith as Exhibit B;
3. Dr. Hoyte's report in the *Teresa England* case, Case No. 2:15-cv-06967, filed herewith as Exhibit C;
4. Dr. Hoyte's report in the *Barbara Hunt*, Case No. 2:17-cv-02945, filed herewith as Exhibit D;

5. Dr. Hoyte's October 22, 2019 deposition in the *England* case, filed herewith as Exhibit E; and

6. Dr. Hoyte's October 22, 2019 deposition in the *Ashbrook* case, filed herewith as Exhibit F.

Respectfully submitted,

/s/ William M. Gage

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CERTIFICATE OF SERVICE

I certify that on this day, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

William M. Gage